

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re:)	
)	Bankr. Case No.: 19-36611-KLP
PATRICIA DENISE DALEY BROWN,)	
)	Chapter 7
Debtor.)	
<hr style="border: 0.5px solid black;"/>)	
)	
PATRICIA BROWN,)	Adv. Proc. No.: 24-03003
)	
Plaintiff,)	
v.)	Judge Kevin L. Phillips
)	
NAVIENT PRIVATE STUDENT LOAN)	
TRUST, and NATIONAL COLLEGIATE)	
STUDENT LOAN TRUST 2004-2,)	
2005-3, and 2006-3,)	
)	
)	
Defendants.)	
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**NAVIENT SOLUTIONS, LLC’S ANSWER TO COMPLAINT
TO DISCHARGE PRIVATE STUDENT LOAN DEBT**

Navient Solutions, LLC (“NSL”), on behalf of itself and named Defendant “Navient Private Student Loan Trust,” by and through its undersigned counsel, hereby provides its Answer to the allegations of Plaintiff, Patricia Brown (“Plaintiff”)’s Complaint to Discharge Private Student Loan Debt (“Complaint”), and states as follows:

PARTIES

1. NSL is without information or knowledge sufficient to form a belief as to the truth of the averments contained within this paragraph of Plaintiff’s Complaint and, therefore, denies same.

2. A portion of this paragraph of Plaintiff's Complaint is not related to Plaintiff's claims against NSL, and as such, NSL provides no response. NSL is without information or knowledge sufficient to form a belief as to the truth of the remaining averments contained within this paragraph of Plaintiff's Complaint and, therefore, denies same.

JURISDICTION and VENUE

3. – 5. Admitted. It is specifically denied that the Court has subject matter jurisdiction over any claim not arising from 11 U.S.C. §523(a)(8).

FINAL ORDER CONSENT STATEMENT

6. NSL consents to the Bankruptcy Court entering final orders and/or judgments on core claims only. NSL does not consent to the Bankruptcy Court entering final orders and/or judgments on any non-core proceedings.

NATURE OF THE ACTION

7. Admitted.

FACTUAL ALLEGATIONS

8. It is admitted only that Plaintiff is indebted to NSL pursuant to the applicable terms of one (1) Chase Select Student Loan, with a balance, including principal, interest and fees, totaling \$35,657.98 as of the date this Adversary Proceeding was filed, and that these loans were used to fund her cost of attendance at the University of Phoenix. NSL is without information or knowledge sufficient to form a belief as to the truth of the remaining averments contained within this paragraph of Plaintiff's Complaint and, therefore, denies same.

9. It is admitted only that Plaintiff is indebted to NSL pursuant to the applicable terms of one (1) Chase Select Student Loan, with a balance, including principal, interest

and fees, totaling \$35,657.98 as of the date this Adversary Proceeding was filed, and that these loans were used to fund her cost of attendance at the University of Phoenix. The remaining portions of this paragraph of Plaintiff's Complaint are not related to Plaintiff's claims against NSL, and as such, NSL provides no response.

10. – 16. NSL is without information or knowledge sufficient to form a belief as to the truth of the averments contained within these paragraphs of Plaintiff's Complaint and, therefore, denies same. Further, these paragraphs of Plaintiff's Complaint contain conclusions of law, to which no answer is required, but in an abundance of caution, are denied. To the extent that portions of these paragraph of Plaintiff's Complaint are assertions of fact, such assertions are denied.

COUNT 1: UNDUE HARDSHIP

17. No response.

18. – 20. NSL is without information or knowledge sufficient to form a belief as to the truth of the averments contained within these paragraphs of Plaintiff's Complaint and, therefore, denies same. Further, these paragraphs of Plaintiff's Complaint contain conclusions of law, to which no answer is required, but in an abundance of caution, are denied. To the extent that portions of these paragraph of Plaintiff's Complaint are assertions of fact, such assertions are denied.

WHEREFORE, Navient Solutions, LLC respectfully requests judgment in its favor and against Plaintiff and such other relief as is just and equitable.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on March 15, 2024, a copy of the foregoing Navient Solutions, LLC's Answer to Complaint to Discharge Private Student Loan Debt was served on the following registered ECF participants, **electronically** through the court's ECF System at the email address registered with the court:

Stanley Tate, Counsel for Plaintiff at tate@tateesq.com

Jason M. Krumbein, Counsel for Plaintiff at JKrumbein@KrumbeinLaw.com

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